

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE PETROBRAS SECURITIES  
LITIGATION

Case No. 14-cv-9662 (JSR)

**CLASS ACTION**

**NOTICE OF CLASS REPRESENTATIVES' MOTION  
FOR AUTHORIZATION TO DISTRIBUTE NET SETTLEMENT FUND**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of the Claims Administrator in Support of Class Representatives' Motion for Approval of Distribution Plan (the "Amin-Giwner Declaration"), the Independent Accountants' Report on Applying Agreed-Upon Procedures prepared by EisnerAmper attached to the Amin-Giwner Declaration as Exhibit C, the Declaration of Jeremy A. Lieberman in Support of Class Representatives' Motion for Authorization to Distribute Net Settlement Fund, and the Memorandum in Support of Class Representatives' Motion for Authorization to Distribute Net Settlement Fund, Class Representatives Universities Superannuation Scheme Limited, Employees Retirement System of the State of Hawaii and North Carolina Department of State Treasurer, through Class Counsel, move this Court for entry of the accompanying [Proposed] Order Granting Authorization to Distribute the Net Settlement Fund. That order will, *inter alia*: (1) approve the Court Administrator's ("Epiq") administrative recommendations accepting and rejecting Claims submitted in the action; (2) direct the distribution of the Net Settlement Fund to Claimants whose Claims have been accepted as valid and approved by the Court; (3) approve Class Counsel's expenses incurred since its May 1, 2018 Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses (Dkt. No. 731); (4) approve Epiq's fees and expenses

incurred in connection with the class certification and settlement phases of the Action; (5) approve EisnerAmper's fees and expenses incurred in connection with its work on this matter; (6) authorize the destruction of paper copies of Claims one year from the time the Settlement Fund is completely exhausted and dispose of electronic copies of the same three years after the Settlement Fund is completely exhausted; and (7) provide that the Court retains jurisdiction to consider any further applications concerning the administration of the Settlements, and such other and further relief as the Court deems appropriate.

Dated: New York, New York  
September 20, 2019

Respectfully submitted,

**POMERANTZ LLP**

By: /s/Jeremy A. Lieberman  
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*Counsel for Class Representatives and the  
Settlement Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 20, 2019, a copy of the foregoing Notice Of Class Representatives' Motion For Authorization To Distribute Net Settlement Fund; and concurrently filed Proposed Order; Memorandum In Support Of Class Representatives' Motion For Authorization To Distribute Net Settlement Fund; Declaration Of Jeremy A. Lieberman In Support Of Class Representatives' Motion For Authorization To Distribute Net Settlement Fund, along with accompanying Exhibits; and Declaration Of The Claims Administrator In Support Of Class Representatives' Motion For Approval Of Distribution Plan and accompanying Exhibits, was filed electronically on the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

/s/Ariana Barbosa  
Ariana Barbosa